

UNITED STATES DISTRICT COURT  
~~SOUTHERN~~ DISTRICT COURT OF NEW YORK.....  
KEITH THOMPSON

14 CV 6509

Plaintiff  
-Against-

INDEX  
JURY DEMAND

Police Officer Merey, Shield #943546

JUDGE SCHOFIELD

Defendants

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**CIVIL COMPLAINT**

1 – This is a civil action filed by Keith Thompson, a United States Citizen alleging violation of his constitutional, pursuant to 42 U.S.C. 1983, 18 U.S.C, 241, 242, Fourth Amendment, seeking money damages, and declaratory judgment.

**Jurisdiction**

2 – This is a civil action pursuant to 42 U.S.C. 1983, 18 U.S.C., 241, 242 Fourth Amendment. This court has jurisdiction under 28 U.S.C. 1333, plaintiff also invokes the pendent jurisdiction of this court

**PARTIES**

3 – Plaintiff Keith Thompson is presently residing at 50-14 Broadway, Apt. 4D, Woodside, N.Y., 11377.

4-Police Office Merey, Shield #943546, he is being sued in his individual capacity an official.

5 – Defendant has acted under the deliberated in difference standard, reckless disregarded absence of policy procedures.

**FACTS**

6 – An intentional tort claim against a city police officer alleges acts of discrimination, harassment, acting under color of state law, malicious prosecution. On April 29, 2013, at 12:00 p.m., Police Officer Merey, Shield #943546 approached plaintiff on 3110 Bainbridge Avenue, Bronx, N.Y. 10467.

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7 – Police Officer Merey, Shield #943546 approached plaintiff behind the company truck vehicle, while plaintiff was unloading products, to be delivered to the store called Aden Deli Grocery located at 3110 Bainbridge Ave. Bronx, N.Y. 10467. Plaintiff was working, in full company uniform, when officer Merey, Shield #943546 approached him, and asked for my driver license, and company truck papers.

8 – I asked officer Merey, Shield #943546, why what was the problem, his reply was just hand over the paper work, so I did. Police Officer Merey Shield #943546, begin to threaten me about giving me several tickets, and even threaten to place me under arrest, while I was working.

9 – At no time at all, did I refuse any direct order given by officer Merey, Shield 3943546, I did inform him, that what he was doing, was unjust, and not right. I began telling Officer Merey, Shield #943546, that he would one day have to answer to god about this situation. My company truck was legally double parked, with commercial license plate .Officer Merey, Shield #943546, issued me a double parking ticket, as well as a disorderly ticket, which I had to appear, in Bronx criminal court. And the results, of the situation Police Officer Merey, #9443546, didn't even appear in court on July 12, 2013.

## **CLAIMS**

### **FIRST CAUSE OF ACTION**

10 – The tortuous conduct of the defendant is deemed intentional when it is demonstrated that the defendant clearly intended to violate plaintiff constitutional rights pursuant to 18 U.S.C. 241 which this statue makes it unlawful for two or more persons to conspire to injure, oppress, threaten or intimidate any person of any state, territory or district in the free exercise enjoyment of any right or privilege secured to him by the constitution of the United States. It further makes it unlawful for two or more person to go on the roadway or the premises of another with the intent to prevent or hinder his free exercise or enjoyment of any rights so secured.

### **SECOND CAUSE OF ACTION**

11 - The action of the defendant violated federal pursuant to 18 U.S.C. when Officer Merey, Shield # 943546, issued me a disorderly conduct ticket, and a double parking ticket, while I was working also threaten to place me under arrest, for no wrong doing.

### **THIRD CAUSE OF ACTION**

12 – The defendant violated my constitutional rights pursuant to the fourth Amendment when he approached plaintiff, with probable cause or official business to harass plaintiff, for no reason other than personal bias. The defendant ask plaintiff for his driver license and gave plaintiff two tickets, which were not justified by law.

**FOURTH CAUSE OF ACTION**

13 – Defendant violated plaintiff's constitutional rights pursuant 42 U.S.C. 1983, when he deprived plaintiff some of the fruits of the constitution which is guaranteed by statute or decree to every United States citizen, when the two tickets were false allegations which caused plaintiff to go through the criminal justice system and being falsely prosecuted which he didn't show up for the court date. The district attorney of the Bronx County found plaintiff not guilty of any charges, which he has given written documentation to support the facts of this matter.

**RELIEF**

Wherefore, plaintiff request this honorable court grant the following:

(A) Issue a declaratory judgment that defendant violated United States constitution and federal statutes when they:

1. He issued two unjustly tickets while I was gainfully working, also having plaintiff to take off from work, to appear in Bronx Criminal Court, for disorderly conduct ticket, which defendant never showed up at court.

(B) Grant compensatory damages in the following amount:

1. Three hundred thousand dollars against the defendant for compensatory damages.
2. Grant four hundred thousand dollars in punitive damages.
3. Grant such other relief as it may appear plaintiff is entitled.

  
Respectfully Submitted  
Keith Thompson (Plaintiff Pro-Se)  
50-14 Broadway, Apt. 4D  
Woodside, N.Y., 11377  
(347-359-2663)

C.C. Corporation Counsel  
Dept of Law City of N.Y.  
100 Church St. 4<sup>th</sup> Floors  
New York, N.Y. 10007

Sworn to before me this 21 day of Dec, 2013

  
HECTOR C. MONDESI  
Notary Public, State of New York  
No. 01MO6212939  
Qualified in Kings County  
Commission Expires October 26, 2017

filed on 8/13/2014  
KT